

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE:**

**CASE NO. 16-10527-TMD**

**DAVID MICHAEL PEHRSON  
CAROLYN SONJA PEHRSON**

**DEBTORS**

**CHAPTER 13**

**CHAPTER 13 TRUSTEE'S OBJECTION TO  
CONFIRMATION OF PROPOSED CHAPTER 13 PLAN AND  
REQUEST FOR INTERIM DISBURSEMENT**

TO THE HONORABLE JUDGE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Comes now Deborah B. Langehennig, Chapter 13 Trustee (hereinafter "Trustee") in the above-captioned and numbered bankruptcy proceeding and files this *Objection to Confirmation of Proposed Chapter 13 Plan and Request for Interim Disbursement*. The Trustee submits the proposed plan does not meet the requirements of 11 U.S.C. § 1325(a) and/or § 1325(b) and in support would respectfully show that at the Section 341 meeting of creditors held on June 8, 2016 the Trustee or a representative of the Trustee requested action on the following issues:

I.

The Debtors are delinquent in making plan payments in the amount of \$919.00.

II.

Documents in support of income must be provided as discussed at the Section 341 meeting on June 8, 2016.

III.

The Debtors must file a Declaration Concerning Confirmation Requirements no later than 7 days prior to Confirmation Hearing.

IV.

The Debtors' plan does not provide for full receipt of all projected disposable income. Upon careful scrutiny of Schedules I and J, it is apparent that the plan payment as proposed is below the present financial ability and best efforts of the Debtors. The Trustee asserts that the Debtors have scheduled payments for items that are unreasonable, unnecessary, and not supported. The Debtors have scheduled monthly expenses in the amount of \$480.00 for Telephone, cell phone, internet, satellite and cable services, \$1,560.00 for Childcare and children's education costs, \$400 for Life Insurance, \$1,210.00 for Moving fees to recover property and \$1,080.00 per month for Storage fees/Furniture rental. The Trustee requests documentation in support of these expenses.

V.

The Proof of Claim filed by the Internal Revenue Service includes estimated taxes.

VI.

The Trustee requests proof of all post-petition payments with respect to contracts to be assumed.

VII.

To the extent that the Trustee has funds on hand at the time of the next and future disbursements to creditors, the Trustee requests that should confirmation of the proposed Plan be denied or reset, she be authorized to immediately disburse, pre-confirmation, the funds on hand to creditors with allowed secured and/or priority claims provided for in the proposed Plan on a pro rata basis, along with the payment of the Trustee fee for disbursement, on a monthly basis following entry of the Order Denying Confirmation.

**PRAYER**

The Trustee requests that the Debtors appear at the confirmation hearing. If these issues are not fully resolved, the Trustee requests that confirmation be denied and that the case be dismissed.

Respectfully submitted,

/s/ Deborah B. Langehennig

Deborah B. Langehennig

6201 Guadalupe Street

Austin, TX 78752

## PAYMENT SCHEDULE BREAKDOWN

16-10527-TMD

Page 1 of 1

Period	Date	Pmt Due	Pmt Rec	Pmt Total	Forgive Amount	Amount Due
1	06/2016	\$919.00		\$0.00		\$919.00

**Total Delinquent Amount: \$919.00**

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE:**

**CASE NO. 16-10527-TMD**

**DAVID MICHAEL PEHRSON  
CAROLYN SONJA PEHRSON**

**DEBTORS**

**CHAPTER 13**

**CERTIFICATE OF SERVICE**

I, Deborah B. Langehennig, certify that a true and correct copy of the Trustee's Objection to Confirmation of Proposed Chapter 13 Plan has been mailed by US Mail (unless otherwise noted below) to the Debtors, the Debtors' Attorney of Record, and all creditors at the addresses listed below on or about June 10, 2016.

CHRISTY B CHRISTOPHER  
PO BOX 9984  
AUSTIN, TX 78766  
(SERVED ELECTRONICALLY)

DAVID MICHAEL PEHRSON  
CAROLYN SONJA PEHRSON  
6500 CHAMPION GRANDVIEW  
WAY #8212  
AUSTIN, TX 78750

U.S. TRUSTEE  
903 SAN JACINTO, SUITE 230  
AUSTIN, TX 78701  
(SERVED ELECTRONICALLY)

Respectfully submitted,

/s/ Deborah B. Langehennig  
Deborah B. Langehennig  
6201 Guadalupe Street  
Austin, TX 78752

